

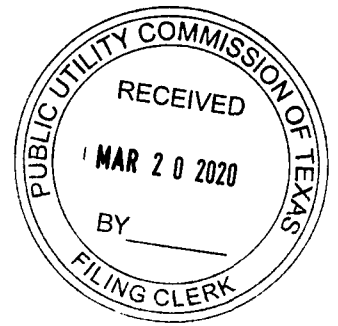


Control Number: 50664

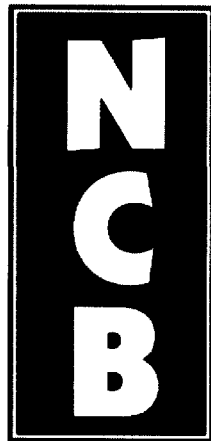


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**Management
Services
Incorporated**
*Professional Collections &
Recoveries Management*

Influenza Pandemic Preparedness Plan

1.0 Purpose:

An influenza pandemic is an occurrence of disease encompassing the whole world. In the last century this has happened three times: 1918 (Spanish Flu), 1957 (Asian Flu) and 1968 (Hong Kong Flu). The Asian and Hong Kong Flu pandemics were relatively mild, though serious for the elderly and the very young. The Spanish Flu of 1918 was more lethal. The death toll from this pandemic has been estimated to be somewhere between 50 million and 100 million people worldwide. Almost half of those that died from the Spanish Flu were young, healthy adults.

Infectious disease experts at the World Health Organization (WHO) and the U.S. Dept. of Health and Human Service's Centers for Disease Control (CDC) expect a new influenza virus called H5N1 (also known as Bird Flu) to be the likely cause of the next influenza pandemic. It has shown itself to be very adaptable and very deadly. Up to this point the H5N1 Bird Flu has killed greater than 50 percent of its human victims, most of which have been under the age of 40 years old. It is believed that the only thing H5N1 lacks before causing an influenza pandemic is the ability to efficiently pass from human to human. It is believed that when this adaptation occurs a pandemic is likely to begin. The experts all agree that once influenza pandemic begins, if it is not halted immediately, there will be no stopping it.

It is believed that the functionality of NCB Management Services, Inc., located in Trevoze, Pennsylvania could be adversely affected during influenza pandemic. It is the goal of the NCB Management Services, Inc. to continue providing outsource collection service to our clients, while also working to protect the health of its employees. The purpose of this plan is to guide decision-making and detail appropriate actions to be taken by the NCB in preparation for an influenza pandemic.

I. Protecting Employee Health

Contingent upon the decision of the NCB's Executive Management Staff, NCB will purchase and maintain a stock of health protection supplies (as enumerated below) to be utilized by NCB employees in the event of influenza pandemic. The decision concerning the type and amount of supplies to be purchased, and when they should be utilized, shall be made by the NCB's Executive Management Staff based upon the best available information concerning health risks posed by an influenza pandemic.

The following items may be purchased at the discretion of the NCB's Executive Management Staff for influenza pandemic preparedness:

- Liquid Hand Sanitizers (active ingredient 60% alcohol or more)
- Tissues
- Latex or Nitrile Gloves
- Computer keyboard/mouse covers (to be sanitized frequently with chlorine solution)
- N95 Respirator Masks
- Anti-virals such as Tamiflu or Relenza (if available)
- Other protective gear deemed appropriate

At the discretion of the NCB's Executive Management Staff and based upon best available information concerning pandemic influenza health risks the following actions may be taken:

- All employees will be encouraged to wash their hands and use hand sanitizers frequently.
- Social distancing will be encouraged with the goal of maintaining a minimum distance of three feet between employees at all times.
- Employees will be encouraged to cover their nose and mouth with a tissue or handkerchief when coughing or sneezing.
- Shaking hands will be discouraged.

Eating lunch at restaurants and other unnecessary trips outside the office will be discouraged. Employees will be expected to bring their own lunches and wash any silverware or containers at home.

- NCB will encourage and if possible facilitate immunization of all employees with the annual influenza vaccine and pneumonia vaccine.

- If available, anti-virals and immunization with the pandemic influenza vaccine will be provided.

All employees will be prohibited from coming to work while ill, or while members of their household experience flu-like symptoms. If an employee begins to run a fever or feel ill while at work they will be required to go home immediately and not return until all symptoms have disappeared.

Informational Note: Shelter In Place And Social Distancing During A Pandemic. Pandemics historically have lasted 12 to 18 months and came in *waves* lasting one to three months each. While pandemic influenza is present in Pennsylvania most people will be expected to shelter in place in their homes. Crowds and public gatherings would likely be prohibited during this time to facilitate social distancing. During this time of high disease occurrence, NCB employees should expect to shelter in place in their homes.

II. Communications and Telecommuting

In the event of a severe influenza pandemic, key employees will be allowed/expected to work from home using the internet, email, telephone, and fax. Transport of office equipment and supplies to employee's homes will be allowed at the discretion of NCB's Executive Management Staff and maintained in the home during the duration of the emergency. During this time, NCB may facilitate conference calls on an as needed basis to help coordinate NCB work.

**** Note – All Security measures must be met and each site must be certified that it is in operational compliance with NCB's Physical and Data Security Policies**

Each of NCB's offices is geographically positioned in excess of 800 miles apart from each other. Each office is a redundant operation of each other. This will allow NCB's Executive Management Staff to re-direct operational work efforts if need be from one site to the other.

III. Providing Technical Assistance During A Pandemic

It is expected that Essential Systems will require a considerable amount of technical assistance during influenza pandemic. Due to the extreme

importance of Essential Systems, technical assistance to help systems continue service will be of the highest priority during a pandemic. To help facilitate continued service during the emergency, technical assistance shall be provided to systems by way of telephone, email or fax. On-site assistance shall be provided contingent upon evaluation of health risk, governmental travel restrictions and willingness of the employee to expose his/her self to danger of infection. In lieu of on-site assistance it is expected that system employees/volunteers will communicate from the field with employees by use of cell phone. In addition, digital cameras, computers and the Internet may also be used to help facilitate technical assistance activities.

IV. Travel

During influenza pandemic, travel restrictions may be enforced by the federal government. At this time, NCB does not have any critical functions that demand an employee to travel to any remote locations. In addition, we do not have satellite locations in East Asia therefore we have no employees traveling to the hot spots that may contract the bird flu. In the event that travel is necessary, travel restrictions may need to be waived in order for NCB employees to provide on-site technical assistance. Contingent upon the employee's willingness to risk infection, NCB will attempt to secure travel waivers/passes for these employees.

V. Essential Office Supplies

At the direction of the NCB's Executive Management Staff, NCB will assess essential office and field supplies needed during an influenza pandemic. Due to the possibility of a shortage of goods and services during and immediately after a pandemic these supplies will be purchased and stockpiled at NCB's Corporate Office and/or employees homes.

VI. Encourage Personal/Family Preparedness

In the time period leading up to a possible influenza pandemic NCB will encourage employees to purchase and stockpile for their personal use supplies such as food, water, and medications. A goal of maintaining at least a 3-month supply of essential items is recommended.

VII. Staffing Allocation of Critical Functions During Pandemic

In the event of a pandemic, and considering that pandemics are historically centralized to a specific demographic, no less than 50% of NCB's critical staff will have permissible remote connectivity and/or option to relocate in order to ensure critical functions are addressed.

2.0 Enforcement:

Violations of this policy will be subject to NCB's Discipline Policy up to and including Termination.

3.0 Revision History

NCB – Created March 2006

Last Reviewed: January 2010

Review/Approval-NCB Security Steering Committee January-2010

Review/Approval-NCB Security Steering Committee January-2011

Review/Approval-NCB Security Steering Committee January-2012

Review/Approval-NCB Governance Committee January-2013

Review/Approval-NCB Governance Committee January-2014

Reviewed/Approved - NCB Governance Committee _Annual Review_Jan_2015

Reviewed & Amended – April 15, 2015.

Reviewed/Approved - NCB Governance Committee _Annual Review_Jan_2016

Reviewed/Approved - NCB Governance Committee _Annual Review_Jan_2017

Reviewed/Approved - NCB Governance Committee _Annual Review_Jan_2018

Reviewed/Approved - NCB Governance Committee _Annual Review_Jan_2019

Official Memorandum



From: Ralph N. Liberio
President & CEO
NCB Management Services, Inc.
To: All valued clients and business partners
Date: March 9, 2020
Re: COVID-19 Virus

Below is a summary of NCB Management Services, Inc.'s preparation in response to the threat raised by the COVID-19. NCB has already taken several pro-active steps in order to stay well informed with the threats that COVID-19 presents. Such steps include:

1. All non-essential travel has been cancelled. Any travel requests are being evaluated by the CEO.
2. Providing every associate with individual cleaning and sanitation supplies for their desk area, including sanitizer, disinfectant and tissues
3. Organizational Wide Memo has been distributed; "Novel Corona Virus FAQ", along with direct links to CDC.
4. All critical staff (Key Executives, Accounting, Payment Processing, IT, Programming, Back Office, Compliance/QA/Dialer Management) has already been outfitted with Company Issued PC's with secured VPN ability
5. Providing employees with options for situations where the associate or their family member(s) may be ill. We are providing these options to reduce the chances of spreading an infection in our offices
 - a. Choose any available PTO and be paid for your time out of the office;
 - b. Choose time off without pay; or
 - c. Choose to work from home (w/pay) via a remote connection (Where possible and when allowed), if this option is feasible at the Company's discretion, depending on your position and job requirements.
6. Put in place an Action Plan (Reserved for emergency use), whereby, NCB's IT Department is currently configuring (To NCB security specifications) up to 100 additional PC's which could be utilized for Remote Home Agent Usage (For Purchase and/or where Client permission is ascertained). These set ups would utilize the same security protocols as any other satellite office NCB has in place today.
 - a. Separate Terminal Server Connections
 - b. Separate, secured VPN Connections to NCB utilizing NCB's secured Firewalls
 - c. 100% LiveVox usage (Inbound and outbound)
 - d. 100% call recording
7. Currently Creating an IT Survey which will be utilized to determine which employees have the proper/required technology components (i.e. bandwidth/WIFI/Router, etc.) at home and would be eligible should the need to execute on a "Work Remotely" plan.

In addition to the above, NCB has a plan that is designed to accommodate employees who may be ill with seasonal colds, the flu and in the worst case, the COVID-19. Additionally, if in any of the four regions in which NCB Management Services, Inc. operates its business are affected by a more geographic spread of the virus, we are prepared to keep the critical business operations running by accommodating key staff members in their homes for the longer term. Below represents NCB's Pandemic Policy and Procedures:

The purpose of this policy is to: (1) ensure that NCB and its affiliates (the "Company") maintain a safe and healthy work environment, and (2) provide a planned and structured way of continuing business operations in the event of a pandemic illness. A "pandemic" is an outbreak of disease over a widespread geographic area.

Pursuant to this policy, there are 2 levels of Company preparation and precaution in the event of a confirmed pandemic illness in the geographic area of a Company office or Company employees. Each level is a more heightened level of preparation and precaution. The Center for Disease Control (CDC) recognizes a "Level 3" state of emergency when there is widespread transmission of a pandemic illness. In the event of a Level 3 emergency in the geographic area of Company employees, the Company will follow all government-recommended advisories and requirements.

LEVEL 1

This level corresponds to the Center for Disease Control's (CDC) Level 1 – "Practice Usual Precautions." Level 1 occurs when the pandemic illness at issue has spread to the United States (or another country where the Company maintains employees) and poses a potential risk to Company employees, offices, and operations.

In the event of a Level 1 situation, normal business operations will continue. The Company will:

- 1. Identify a Pandemic Illness Coordinator.*
- 2. Ensure office(s) are stocked with tissues, soap, hand sanitizer, and disinfectant wipes.*
- 3. The Company will closely monitor the changes of the pandemic through the Center for Disease Control (CDC), World Health Organization (WHO), OSHA, and other government updates.*
- 4. Be aware of government contingency planning, including CDC, WHO, OSHA, and other government announcements.*
- 5. Confirm personal phone numbers and personal email addresses for all employees in case of emergency notifications from the Company.*
- 6. Determine the manner and means of emergency notifications from the Company to employees.*
- 7. Identify the Company telephone number employees should call to determine if the office is open or closed.*
- 8. Confirm the leadership succession plan in the event certain members of management are temporarily unable to perform their essential job functions.*
- 9. Reaffirm the call-out procedure in the event an employee or employee's family member is ill.*
- 10. Identify all employees who could work at home in case of a pandemic illness outbreak in or near the office location(s) that causes office and school closures.*
- 11. Identify the necessary steps, including computer equipment and system updates, to provide remote access to employees who do not currently have the ability to work at home. To the extent necessary, obtain approval from clients for remote access.*
- 12. Discourage non-essential business travel.*
- 13. Educate employees on "Social Distancing," such as avoiding hugs and shaking hands.*
- 14. Disseminate information encouraging good hygiene practices, including washing hands often with soap and warm water for at least 20 seconds. If soap and water are not available, use an alcohol-based hand sanitizer; avoid touching of eyes, nose, and mouth with unwashed hands; and staying home when sick.*
- 15. Ensure that cleaning crews have ample & appropriate supplies ready to clean doorknobs, stair railings, elevator buttons, and any commonly touched areas.*
- 16. Post a CDC handwashing notice found here:
<https://www.cdc.gov/handwashing/posters.html>*
- 17. The Company will remind all employees they must:*
 - Stay home if they are sick with a fever or respiratory illness.*
 - Regularly wash their hands for 20 seconds with soap and water or use hand sanitizer, especially after using the restroom, coughing, sneezing, or blowing their nose.*

- *Avoid touching their noses, mouths, and eyes with unwashed hands.*
- *Cover their coughs and sneezes with a tissue or their arm if a tissue is not immediately available.*
- *Avoid using other employees' phones, desks, tools, or equipment unless necessary.*
- *Notify the Company immediately if directly exposed to or confirmed positive for the pandemic illness at issue or any other contagious illness, such as influenza.*

Attendance During Level 1 Precautions:

Absent a legally recognized disability or certified serious medical condition, employees may not refuse to report to work due to concerns about the potential risk of infection, unless they are quarantined by the government or believe they are in imminent danger or harm (as defined by OSHA), immediate need of a reasonable accommodation (confirmed by a treating medical provider), or require leave under the Family and Medical Leave Act (FMLA) or a state or local law equivalent. If an employee refuses to come into work during a Level 1 situation without sufficient grounds, the Company's regular attendance policy applies, absent extenuating circumstances as determined by management.

LEVEL 2

This level corresponds to the CDC Level 2 – “Sustained Community Transmission.” In addition to the Level 1 precautions and preparation, the Company will:

- 1. Continue to educate and encourage good hygiene practices and educate employees on the signs and symptoms of the pandemic illness, how it is transmitted, and all government updates. The Company will provide this information in signage placed at worksite entrances and through use of e-mail and text communications.*
- 2. Require employees to engage in “Social Distancing” by avoiding group events or close contact (within 6 feet), avoiding handshakes and hugs, and encouraging telephone communications (rather than in-person meetings) whenever possible.*
- 3. Implement alternative (work at home) working arrangements wherever feasible.*
- 4. Identify additional job positions that could potentially be performed from home, and contingency plans for specific job functions that cannot be performed at home.*
- 5. Offer extra hours and overtime pay (pursuant to state and federal laws) as needed to ensure continued business operations. The Company reserves the right to temporarily alter or change any part of employees' job roles and schedules based on the needs of the Company during a pandemic outbreak.*
- 6. Limit points of access to office locations.*
- 7. Potentially implement voluntary health screening stations in compliance with the Americans with Disabilities Act (ADA) and other applicable laws, rules, and regulations.*
- 8. Stay in frequent contact with local health authorities to be aware of procedures being implemented by federal, city, and state officials that will impact worksites.*
- 9. Communicate frequently with employees to stay informed of their work status and to communicate other matters related to the pandemic.*
- 10. Communicate with employees immediately (via text, email, and notices) if it is confirmed that an employee in that location is infected with the pandemic illness. The infected employee's name will not be released; however, the coworkers who work in the vicinity of the infected employee will be individually notified of the infection. As part of the communication, the Company will recommend that the employees take all actions recommended by the CDC and other government publications.*
- 11. At Level 2, all non-essential business travel will be suspended. Further travel restrictions may be enforced by the federal government.*

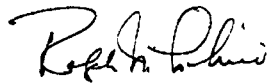
Attendance During Level 2 Precautions:

During Level 2, the Company will consider leave of absence requests on a case-by-case basis, taking into account the needs of the business, government recommendations and requirements, and the needs of employees. The Company will require a release to return to work for any illness-related absences of 3 or more days or more. If an employee is unable to work due to an emergency school closure that impacts the employee's family, the Company will treat those absences as excused. Time off work will be unpaid unless the employee has accrued but unused paid time off. Unemployment Insurance (UI) Benefits may be available, depending on the length of time out, reason for absences, and state-specific UI requirements. The Company's FMLA and ADA policies will continue to apply. If an employee has been exposed to the pandemic illness and is not quarantined by the government, the Company reserves the right to determine whether quarantine (away from the office) is appropriate, and, if so, whether the employee may work from home or will be placed on a leave of absence. All pandemic illness absences and quarantine absences will be excused. Regular attendance policies apply while approved employees are working from home.

We are all responsible for keeping our workplaces safe and healthy. Your proactive steps are needed to help prevent the spread of any pandemic illness. Please contact HR with any questions.

If you should have any questions, please do not hesitate to contact me directly.

Best regards,

A handwritten signature in black ink, appearing to read "Robert A. Lohme". The signature is fluid and cursive, with the first name "Robert" being more prominent than the last name "Lohme".